



MEMORANDUM

TO: MEMBERS OF THE TECHNICAL GUIDELINES DEVELOPMENT COMMITTEE

FROM: COMMISSIONER RAY MARTINEZ

SUBJECT: FURTHER DEVELOPMENT OF VOLUNTARY VOTING SYSTEM GUIDELINES

DATE: SEPTEMBER 29, 2005

I would like to express my sincerest appreciation to all of the members of the Technical Guidelines Development Committee (TGDC) and staff at the National Institute of Standards and Technology (NIST) for your continued commitment to this important project. I would also like to join my colleagues in extending a warm welcome to Dr. William Jeffrey as the new Chairman of the TGDC, as well as to Nebraska Secretary of State John A. Gale.

The development of performance standards for our Nation's voting systems is among the most significant responsibilities of the U.S. Election Assistance Commission (EAC). As a result of the tremendous work done by NIST and the TGDC to produce the initial draft of recommendations, the EAC is poised to soon deliver to the American public the first comprehensive update of voluntary voting system standards since 2002.

As you begin the process of deciding where to focus NIST staff and resources in the coming fiscal year for additional work in the area of voting system standards, I respectfully submit the following comments for your consideration:

1. **SECURITY AND TRANSPARENCY:** Earlier this year, I stood before this Committee and urged that the issue of security of voting systems be a primary focus of any proposed voluntary voting system guidelines. I would like to reiterate that request again today. Significant progress was made in the proposed Voluntary Voting System Guidelines (VVSG) in addressing several important security concerns, including the use of wireless technology in the voting environment and guidelines for voter verified paper audit trails (VVPAT). However, additional work in the area of voting system security must be addressed, and I support efforts by NIST to develop a comprehensive security testing strategy, including the development of cyber security test methods and conformance test suites, voting system threat analysis, further development of methods for Independent Dual Verification (IDV) and better procedures for Commercial Off-The-Shelf Software (COTS) testing. Likewise, I strongly urge that NIST continue its work in

developing the National Software Reference Library as a valuable tool for election administrators in ensuring the integrity of voting system software.

2. **HUMAN FACTORS AND PRIVACY:** As you know, the proposed VVSG contain significant enhancements regarding Human Factors and Privacy, and the EAC has been well-served by the important work done in this area. I support efforts by NIST to further develop guidelines pertaining to usability and accessibility, including efforts to establish performance benchmarks from the user's perspective and the development of Human Factors test methods and test suites.
3. **TIMELINE FOR NEXT ITERATION OF VVSG:** Finally, as to the issue of when the next iteration of voluntary voting system guidelines should be delivered to the EAC, I believe that as work is completed in each respective area (i.e., Security, Human Factors, Core Requirements, etc.) that each completed module be transmitted to the EAC. In doing so, the EAC can then immediately consider whether to commence the public comment and review period for that particular module(s) and ultimately, can ensure that any future changes or modifications to the Voluntary Voting System Guidelines are accomplished with minimal disruption to the election community.

In closing, allow me to reiterate my personal commitment to fulfilling the promise of the Help America Vote Act of 2002 – to improve the process of election administration. I am proud to work as a partner with both NIST and the TGDC in ensuring that the American public has full confidence in the integrity, accuracy and fairness of our electoral process. I thank you for your selfless commitment to this important endeavor.